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Cc:	LARSEN Henning; ROICK Tom; Will Park
Subject:	RE: Arkema Source Control Conference Call Draft Agenda
Date:	05/08/2007 03:29 PM

All,

Below is a draft annotated agenda for the Arkema source control conference call scheduled for May 18th from 9:00 am until 12:00 and call-in information.

Non-Responsive

Please let me know if anyone wants to add anything to the agenda.

1. **Rhone-Poluenc Groundwater Plume Source Control**

- The upstream edge of the Rhone-Poluenc (RPAC) groundwater plume crosses Arkema Lots 1 and 2. The projected in-river discharge area for this portion of the RPAC plume is downstream of the area originally identified by EPA as the preliminary Arkema early action area. The predominant groundwater transport pathway of concern is a gravel filled "trough" in the top of the basalt oriented north/northeast and discharging north of the Arkema Lots 1 and 2 area and the BNSF railroad bridge. Based on this *and what are considered by DEQ to be higher priority upland RPAC RI and source control work,* DEQ agreed to a schedule, compatible with the in-river RI/FS, with RPAC to conduct a source control evaluation (SCE) for the portion of their plume on Lots 1 and 2 followed by a groundwater source control focused feasibility study.
- EPA has recently expanded the potential in-river Arkema early action area to include the upstream portion of the projected RPAC groundwater discharge area. This raises the potential that at least a portion of the RPAC groundwater plume will need to be controlled to support the Arkema in-water early action. It is DEQ's understanding that the scope of the in-water early action will not be determined until the completion of the EE/CA.
    A. Is it likely that the EE/CA will require sediment removal in the RPAC groundwater plume discharge area?
    B. If so, could source control of this portion of the RPAC groundwater plume be deferred until the final ROD if RPAC can demonstrate that the plume is not likely to recontaminate (i.e., loading analysis) sediment within the early action area? Please note that chlorinated benzene levels exceed AWQC organism consumption values and RPAC is currently working on a study to determine the mobility of dioxin in the aquifer.
    C. Should it be determined that the upstream portion of the RPAC groundwater plume needs to be controlled in order to support the in-water early action, what is the target schedule for the in-water work?
    D. Next steps.

2. **Arkema Groundwater Plume Source Control**

- DEQ is committed to implementing upland source control at the Arkema site necessary to support the in-water early action (primarily control sources to prevent sediment recontamination).
- The EPA/Arkema Early Action Order authorizes EPA to implement upland source control if Arkema is not adequately progressing either in scope or schedule.
- In the SCE Arkema has proposed to actively control what DEQ agrees is the high priority groundwater plumes. These are the plumes that clearly pose a risk for sediment recontamination, contaminant loading of fish tissue or a risk to aquatic receptors.
- The area between the proposed barrier wall and the RPAC groundwater plume falls into the medium priority category for source control. Meaning that additional evaluation or characterization would clarify if groundwater contaminants needs to be controlled to support the early action or can be deferred until the in-water RI/FS process provides direction.
- EPA has indicated that one of the objectives of the EPA/Arkema Early Action Order is for the early action to achieve protective levels for all relevant exposure risk scenarios within the boundary of the early action area (including potential ARARS and drinking water SLVs). In lieu of requiring Arkema to conduct baseline and post early action risk assessments, EPA has indicated that they are using Joint Source Control Strategy (JSCS) screening level values as remedial action objectives for the early action and by extension upland source control.
    - A. In the area between the proposed wall and the RPAC plume, does Arkema have the option of pursing a weight-of-evidence evaluation provided it can be worked through in a time frame compatible with source control implementation?
    - B. If so I would like to agree on what weight-of-evidence evaluation is required (i.e., sediment loading recontamination analysis and additional characterization to confirm the contaminant distribution model).
    - C. If not, is EPA requiring active groundwater source control for any exceedance of JSCS SLVs to support the early action?
    - D. Agree on directions to Arkema concerning groundwater down stream of their proposed groundwater containment system.

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